

Inter-Agency Management Integration Team Meeting Minutes July 16, 2020




U.S. Department of Energy
Washington State Department of Ecology
U.S. Environmental Protection Agency

SIGNATURES:

Approval:  Date: 9/28/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.09.14 13:43:33 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval:  Digitally signed by Smith, Alex (ECY)
Date: 2020.09.14 14:52:19 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval: DAVID EINAN Digitally signed by DAVID EINAN
Date: 2020.09.14 15:45:24 -07'00' Date: _____
D.R. Einan, EPA IAMIT Representative

Inter-Agency Management Integration Team Meeting Minutes
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1.0 WELCOME AND LOGISTICS/FORMAT

The Inter-Agency Management Integration Team (IAMIT) meetings are normally held monthly between the U.S. Department of Energy (DOE), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA); also referred to as the Parties.

This meeting was held remotely via video and telecom utilizing the Microsoft Office Teams software, a communication and collaboration platform, due to the Hanford Site's current Phase 1 Remobilization process stemming from the COVID-19 (coronavirus) pandemic.

Mission Support Alliance, LLC (MSA) welcomed the IAMIT members and explained this was a standard IAMIT meeting that would cover the agenda items and action tracking table provided in the handout (see attachments).

2.0 REVIEW IAMIT ACTION TRACKING TABLE

2.1 Action Items

2.1.1 Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C/TPA Change Control Form M-15-18-03 – “Initiate Characterization Field Work for 200-SW-2 Operable Unit Landfills”

At the June 18, 2020 IAMIT meeting, the Parties reached agreement to add milestone M-015-93C into the M-091 milestone series negotiations to synchronize the burial ground Remedial Investigation/Feasibility Study (RI/FS) work with the radioactive solid waste retrieval. An Agreement in Principle (AIP) was approved by the Parties on July 13, 2020 to negotiate these milestones through July 31, 2020.

Ecology indicated they met with DOE on the M-091 milestone negotiations and have seen a draft change package for M-015-93C, in addition to the M-091 milestones. The Parties have another meeting scheduled the week of July 20, where Ecology plans to provide DOE with some feedback on the draft change packages.

Ecology inquired, since the AIP had been signed to negotiate the M-015-93C, if this action could be closed at the IAMIT level.

DOE stated that having this milestone in the AIP does not necessarily resolve the issue. It just means the Parties are going to discuss or negotiate the issue and the AIP is the way to come to an agreeable resolution. However, if the Parties are not successful in their negotiations, this issue would not be resolved and the dispute would still be with the IAMIT to resolve.

Ecology agreed with DOE that this milestone should still be tracked at the IAMIT level until the Parties reach a Tentative Agreement. This item will continue to be tracked at the IAMIT level in the interim.

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2.1.2 Possible Adoption of the Principles and Parameters in Regulatory Documents

The Principles and Parameters Working Group continues to meet and is working on the draft Principles and Parameters document (DOE-2019-46).

Ecology made comments on the document and the Working Group has gone through all of those comments and has fundamentally agreed on all but one comment. Ecology stated DOE would be updating the document to incorporate these comments and then provide the document to Ecology and EPA for review again.

Ecology will also draft a change control form that will add the Principles and Parameters document into TPA Appendix F, Supporting Technical Plans and Procedures.

At the June 18, 2020 IAMIT meeting, the Working Group committed to finishing this work by August 13, 2020, one week before the August IAMIT, scheduled for August 20, 2020. Ecology stated they were concerned with the working time and summer vacations and believed they may not complete it by the August 13 date. However, Ecology believed they were making excellent progress.

DOE agreed really good progress has been made and suggested briefing the IAMIT in September instead, to allow the Working Group more time to work on the document.

The Parties agreed the Principles and Parameters Working Group has until September to revise and review the document, draft the change control form to incorporate the document into TPA Appendix F, and present the draft IAMIT Determination to the IAMIT. This action will be tracked at the IAMIT level in the interim.

2.1.3 Changes/Updates to TPA Paragraphs 148/149

The Parties are under an Agreement in Principle (AIP) to negotiate updates to paragraphs 148 and 149 through July 31, 2020.

At the May 26, 2020 IAMIT, MSA took the action to coordinate getting the appropriate agency personnel together to meet and negotiate changes. A series of three meetings has been scheduled for August 2020.

DOE provided an update, stating the embargoed budget guidance from the Office of Management and Budget and DOE headquarters had been sent to the Parties' attorneys for review. A TPA change control form has been drafted so the Parties can negotiate making line-by-line changes to TPA paragraphs 148 and 149 during the scheduled meetings. DOE also stated a new DOE lead attorney had been assigned for these negotiations.

EPA stated the AIP needed to be extended since the Parties were meeting in August 2020.

DOE proposed to the Parties an AIP extension through December 2020.

EPA stated they would like to have the negotiations concluded before December, but in terms of not having to do another AIP extension, agreed with extending the negotiations through December 2020.

Ecology had no objection with extending negotiations to December 2020.

Due to the holidays in late December and early January, the Parties agreed to extend the AIP until January 15, 2021. MSA took the action to draft the AIP extension and route for IAMIT approval. This item will be tracked at the IAMIT level in the interim.

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2.1.4 Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

There was no update provided this month. At the April 16, 2020 IAMIT meeting, DOE took the action to provide an update to the IAMIT on D4 planning efforts once the site is able to resume normal operations, pending ongoing mission essential operations due to coronavirus and pending Hanford prime contracts' transition. This item will be tracked at the IAMIT level in the interim.

2.1.5 IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements

At the end of March 2020, the Parties agreed a change was necessary to the TPA, Legal Agreement, Part Five, Common Provisions, Article XXXIII, Notification, which states that documents sent between the Parties will be sent by certified or overnight express mail or hand-delivered. Due to the coronavirus, personnel are currently unable to process mail or hand-deliver documents.

On May 26, 2020, the Parties agreed to an additional 10-week extension in suspending these requirements with an approved IAMIT Determination 2020-005, which expires on July 31, 2020.

The Parties agreed to extend this IAMIT Determination until January 15, 2021. MSA took the action to draft the extension and route for IAMIT approval. This item will be tracked at the IAMIT level in the interim.

2.2 Status Updates

2.2.1 Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

There was no update provided this month. At the October 17, 2019 IAMIT meeting, the Parties agreed revisions to Appendices H and I would be placed on hold pending the potential path forward determined from the Hanford tank waste mission holistic discussions. DOE proposed to continue tracking until discussions conclude. This item will be tracked at the IAMIT level in the interim.

2.2.2 Agreement in Principle: TPA Changes in Response to Federal Fiscal Year 2018 and 2019 Budgets

At the November 21, 2019 IAMIT meeting, the Parties agreed the draft Budget Agreement in Principle (AIP) should be placed on hold pending results of the "Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL)" team briefings and path forward.

At the May 26, 2020 IAMIT meeting, the Parties agreed to draft an IAMIT Determination and White Paper that will provide and document the RASCAL Team's recommendations. On June 23, 2020, the IAMIT approved IAMIT Determination 2020-006, "RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau."

At the June 18, 2020 IAMIT meeting, the Parties agreed an AIP should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft "Budget AIP" that was placed on hold. MSA had the action to draft the AIP and provided it to DOE for review. Ecology and EPA also drafted an AIP and provided it to DOE for review.

DOE stated they are currently reviewing the AIPs and targeting early next week to provide feedback to the group.

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EPA provided a quick update on the RASCAL Team work in progress. The RASCAL Team is currently working on completing the binning of the waste sites and plans to produce a document to memorialize how the RASCAL Team decided to bin the different waste sites. The RASCAL Team anticipates having a few more sessions to complete this process and get it documented.

Ecology added the RASCAL Team is going to discuss potential options for memorializing and documenting the process for the 200-EA-1 and 200-WA-1 Operable Unit waste site revisions.

This item will be tracked at the IAMIT level in the interim.

2.2.3 Modifications to Tri-Party Agreement Section 9.4, Administrative Record (AR) to Eliminate Hard Copy Requirements

There was no update provided this month. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. This item will be tracked at the IAMIT level in the interim.

2.3 Recently Closed/Other Agreements

Refer to attachment, IAMIT Decision Table/Action Tracking, Table III, Recently Closed/Other Agreements, which were closed at the June 18, 2020 IAMIT meeting. The three closed items include:

- Baseline Risk Assessment for Waste Management Area C,
- IAMIT Determination – Delete Audio Files of Meetings upon Approved Meeting Minutes, and
- Update of TPA Appendix B: Listing of Treatment, Storage, and Disposal Groups/Units.

3.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

3.1 Practical Quantitation Limit (PQL) Changes/Potential Effect on Sampling and Analysis Plans

At the June 18, 2020 IAMIT meeting, DOE took the action to investigate these changes and provide an update to the IAMIT in July.

DOE stated there were some change notices for Sampling and Analysis Plans (SAP) that included updates to require quantitation limits. Of particular note, on the 100N groundwater SAP, some of these changes included increases that would have exceeded action levels where an analytical method is actually available to achieve lower quantitation limits. DOE looked into how that oversight occurred and a revised change notice has been prepared that includes consideration of the methods and labs that can achieve the lower quantitation limits that are needed. DOE has spoken with Ecology and EPA about this and is ready to send the revised change notice over for their review.

Ecology asked if DOE plans to revise ECF-Hanford-18-0058, *Practical Quantitation Limits for Groundwater Environmental Samples*, which had the original PQLs in it, to a revision three, instead of a revision two.

DOE stated they are revising ECF-Hanford-18-0058 to include an upfront note to users to consider action levels, data needs targets, as well as other updates to be sure that the 8270 SIM methods are in there. DOE indicated this revision is a few weeks out.

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Ecology and EPA appreciated the update and agreed with the proposed path forward.

DOE stated the path forward is working at the staff level and proposed to remove this item from future IAMIT discussions unless there is an issue.

EPA agreed this item could be removed from IAMIT discussion.

Ecology agreed the projects staff have it handled and could work the details of getting these changes revised and finished.

The Parties agreed this item will no longer be tracked at the IAMIT level.

3.2 Borrow Source for Silt Loam Soil Material for Engineered Barriers

At the May 26, 2020 IAMIT meeting, Ecology requested DOE provide a briefing on the borrow source for silt loam soil material for engineered barriers.

At the June 18, 2020 IAMIT meeting, DOE took the action to discuss this internally, considering recent events and its available resources between now and June, and may brief the IAMIT in July.

DOE stated they discussed this with Ecology and are aware they have a large need for borrow source material moving forward for the barriers but do not currently have the resources to work this now. DOE indicated they did some studies on this a number of years ago with Borrow Area C. However, DOE put a hold on this planning until the Central Plateau clean up contract and transition starts, possibly in September 2020 and then finish up in the January 2021 timeframe. DOE plans to review this work scope under that Central Plateau contract going forward and will evaluate the right time to proceed.

Ecology stated this issue will start impacting permitting the closing units before too long and the issue is that while it makes sense not to do a final design before there is borrow source identified, the permit closure plans are supposed to include final designs or 90% designs. This is an issue that EPA has raised with Ecology before and believed it would continue to be an issue but did not know if this needed to be tracked at the IAMIT level anymore.

The Parties agreed to remove this from the agenda and then revisit it, if and when needed. This item will no longer be tracked at the IAMIT level.

3.3 Update on Ecology Request to Enter Into Formal TPA Negotiations on Closure Milestones for WMA-C

At the June 18, 2020 IAMIT meeting, DOE committed to updating the IAMIT in July on its willingness to enter into an AIP to negotiate the WMA C milestones with Ecology.

DOE stated they have exhausted all of their efforts on this subject area at the Project Manager level but wanted to hear Ecology's thoughts.

Ecology responded by saying they did see some feedback on this from the holistic negotiations and WMA C closure is one of the areas being negotiated between DOE and Ecology. Ecology further stated, not knowing when the holistic negotiations will conclude, that does not give them assurance they will have closure schedules in time to put WMA C into the Revision 8 Permit. Ecology indicated this is driven by the need to have closure schedules to put the Closure Plan into the Permit. Therefore, Ecology believes entering in to an AIP will provide a hard date to finish negotiations.

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DOE showed interest in possibly entering into an AIP to negotiate these milestones with Ecology but wanted to discuss the potential negotiation topics and milestones further with Ecology prior to committing.

Ecology agreed to meet with DOE and took the action to schedule time for the agencies to discuss this further. This item will be tracked at the IAMIT level in the interim.

3.4 Update on Ecology Request to Enter Into a Structured “Kaizen” for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure

At the June 18, 2020 IAMIT meeting, Ecology stated they received feedback during a working group meeting about the efficiency and effectiveness of the primary document review and comment process and proposed doing a Kaizen between DOE and Ecology on DOE-ORP documents to improve the flow and make it more effective.

DOE stated it would be willing to participate in a Kaizen with Ecology.

Both DOE and Ecology requested EPA participation in the Kaizen. EPA will consider after evaluating available resources.

The Parties agreed to meet to discuss the content and logistics of the Kaizen. This action will be tracked at the IAMIT level in the interim.

4.0 REVIEW OF TODAY’S ACTIONS/UPCOMING IAMIT MEETINGS

The following actions were captured during the meeting and provided to the Parties following this IAMIT meeting:

No.	IAMIT Topic	Actions from 7/16/20 IAMIT Meeting
1	Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C/TPA Change Control Form M-15-18-03 – “Initiate Characterization Field Work for 200-SW-2 OU Landfills”	At the June 18, 2020 IAMIT, the Parties agreed to move milestone M-015-93C in the scope of the M-091 negotiations. An Agreement in Principle was signed on July 13, 2020 to negotiate these milestones through July 31, 2020.
2	Possible Adoption of the Principles and Parameters in Regulatory Documents	At the June 18, 2020 IAMIT, the Parties agreed that the Principles and Parameters guiding document/procedure would be added to Appendix F of the TPA and an accompanying IAMIT Determination would be drafted to ensure that the Appendix F procedure is followed. At the July 16, 2020 IAMIT, the Parties agreed the Principles and Parameters Working Group has until September to revise and review the document, draft the change control form to incorporate the document into TPA Appendix F, and present the draft IAMIT Determination to the IAMIT.

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No.	IAMIT Topic	Actions from 7/16/20 IAMIT Meeting
3	Changes/Updates to TPA Paragraphs 148/149	The Parties agreed to extend the AIP until January 15, 2021 to allow more time for negotiations. MSA took the action to draft the AIP extension and route for IAMIT approval
4	IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements	The Parties agreed to extend this IAMIT Determination until January 15, 2021. MSA took the action to draft the extension and route for IAMIT approval.
5	Agreement in Principle: TPA Changes in Response to Federal Fiscal Year 2018 and 2019 Budgets	At the June 18, 2020 IAMIT meeting, the Parties agreed an AIP should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft “Budget AIP” that was placed on hold. MSA had the action to draft the AIP and provided it to DOE for review. Ecology and EPA had also drafted an AIP and provided it to DOE for review. DOE stated they are currently reviewing the AIPs and targeting early the week of July 20 to provide feedback to the group.
6	Update on Ecology Request to Enter Into Formal TPA Negotiations on Closure Milestones for WMA-C	DOE showed interest in possibly entering into an AIP to negotiate these milestones with Ecology but wanted to discuss the potential negotiation topics and milestones further with Ecology prior to committing. Ecology agreed to meet with DOE and took the action to schedule time for the agencies to discuss this further. This item will be tracked at the IAMIT level in the interim.
7	Update on Ecology Request to Enter Into a Structured “Kaizen” for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure	The Parties agreed to meet to discuss the content and logistics of the Kaizen. Both DOE and Ecology requested EPA participation in the Kaizen. EPA will consider after evaluating available resources.

The next IAMIT meeting is scheduled for August 20, 2020.

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5.0 LIST OF ATTENDEES

Bergman, Theresa	CHPRC
Brasher, Stephanie	MSA
Bowers, Holly	WRPS
Boyd, Alicia	Ecology
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Davis, Scott	MSA
Einan, Dave	EPA
French, Mark	DOE
Hamel, Bill	DOE
Hastings, Rob	DOE
Higgins, Kathy	DOE
Hildebrand, Doug	DOE
Lobos, Rod	DOE
Menard, Nina	Ecology
Price, John	Ecology
Smith-Jackson, Noel	Ecology
Sondag, Joseph	DOE
Teynor, Tom	DOE
Turner, Michael	MSA
Welsch, Kim	Ecology



Inter-Agency Management Integration Team (IAMIT) Meeting
Thursday July 16, 2020
8:00 a.m. – 9:00 a.m.

*Meeting held via Teams video/teleconference

Agenda

No	Time	Lead / Org	Topic
1	8:00 – 8:02 a.m.	Michael Turner, MSA	Welcome and Meeting Logistics/Format
2	8:02 – 8:20 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review IAMIT Action Tracking Table
3	8:20 – 8:35 a.m.	B. Hamel, DOE-RL	Update on Ecology Requests: <ul style="list-style-type: none"> • PQL Changes/Potential Effect on Sampling and Analysis Plans • Borrow Source for Silt Loam Engineered Barriers
4	8:35 – 8:40 a.m.	J. Price, ECY R. Hastings, DOE-ORP	Update on Ecology Request to Enter Into Formal TPA Negotiations on Closure Milestones for WMA-C
5	8:40 – 8:45 a.m.	J. Price, ECY R. Hastings, ORP	Update on Ecology Request to Enter Into a Structured “Kaizen” for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure
6	8:45 – 8:50 a.m.	IAMIT members	New Topics for Upcoming IAMIT Meetings
7	8:50 a.m. – 9:00 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review of Today’s Actions
8	9:00 a.m.	Adjourn	

Inter-Agency Management Integration Team Decision Table/Action Tracking

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Table I. Action Items¹

1. Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C / TPA Change Control Form M-15-18-03 – “Initiate Characterization Field Work for 200-SW-2 OU Landfills”

Reference: Letter: 18-NWP-096; Statement of Dispute: AR-01073 (letter 19-SGD-0008)

Affected Milestone: M-015-93C

Originated: Dispute initiated at the Project Manager level 7/09/18. Elevated to the IAMIT level on 03/14/19.

Status: Open

Dispute Extended: The Parties had until 04/30/19 to resolve dispute at the IAMIT level (latest extension signed on 04/04/19). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA.

Action: Parties are being asked to resolve dispute at the IAMIT level or send to Ecology Director for Director’s Determination.

Comments: At the 4/24/19 IAMIT meeting, Ecology noted that the TPA-prescribed due date for a Final (Director’s) Determination may have lapsed and proposed extending the dispute at the IAMIT level. DOE took the action to set up a meeting to discuss Federal Fiscal Years 2018, 2019 budgets. DOE-RL stated that this milestone is now different from the other milestones in the Agreement in Principle (AIP) and Tentative Agreement (TA) and needs to be addressed separately (Ecology elevated it from the PM level to the IAMIT level). On 05/16/19, the Parties agreed not to issue the Director’s Determination extension and work resolution via the budget AIP and TA. A draft AIP and TA which includes M-015-93C, is in review by the Parties. If signed, the AIP and TA including M-015-93C would resolve this dispute. On 07/03/19 Ecology noted it would not sign the AIP until it received a response to its letter of 07/10/19 (19-NWP-109). At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. On 09/09/19, DOE-RL requested Ecology’s reconsideration in approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 11/21/19 IAMIT, Ecology noted they have requested a briefing from DOE on the FY20 Continuing Resolution (CR) impacts (in accordance with TPA Legal Agreement, paragraph 149.F). DOE reported they have scheduled the FY19 year-end accomplishments briefing and then will schedule an Integrated Priorities List follow-on briefing which will include FY20 CR impacts. At the 12/19/19 IAMIT, Ecology suggested coordinating milestone M-015-93C (Characterize field work for 200-SW-2 Operable Unit) with the M-091 milestone for retrievals. DOE is currently evaluating options, including scheduling a meeting with Ecology to discuss. The agencies have agreed to remove this milestone from the budget AIP. DOE met with the Carlsbad Field Office (WIPP) in late February and will schedule a meeting with Ecology to discuss options and a potential path forward. At the 04/16/20 IAMIT, DOE committed to scheduling a meeting with Ecology to provide the latest status. At the 05/26/20 IAMIT, Ecology noted there is an M-091 milestone due 09/30/20 and reminded DOE of their 90-day notification requirement on that milestone. Ecology indicated they would like to talk about the M-015-93C dispute at the same time as the M-091 milestones. DOE agreed to take

¹ *New information shown in blue.

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M-015-93B and M-015-93C, out of the “budget” negotiations and add them to the M-091 milestone negotiations. [At the 06/18/20 IAMIT, the parties agreed to move Milestone M-015-93C in the scope of the M-091 negotiations. AIP to negotiate M-091 milestones was signed 7/13/20 - AIP approved to negotiate through 7/31/20.](#)

Closed —

2. Possible Adoption of the Principles and Parameters in Regulatory Documents

Reference: DOE/RL-2004-60, REV.1, DOE/RL-2019-46

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.

Comments: IAMIT has agreed to discuss this topic as a “core” IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the “Principles and Parameters” and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. At the 10/17/19 IAMIT, the agreed to discuss this subject and path forward at the November IAMIT. The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT. At the 11/21/19 IAMIT, the parties agreed to form a small working group, made of up of each agency’s subject matter experts to discuss and eventually bring their conclusions to the IAMIT. At the 12/19/19 IAMIT, the agencies were asked to identify SME’s to form a small working group. Agencies have identified SME’s, the team will consist of:

- Craig Cameron, EPA
- John Price, ECY
- Doug Hildebrand, RL
- Rod Lobos, ORP

First meeting of the group occurred 01/23/20. Affected milestones and work plans were discussed as well as a potential IAMIT Determination to document conclusions. Second meeting of the group was held 03/09/20. At that meeting, Ecology handed out a draft letter that parameters (cleanup standards) be applied to Waste Management Areas through the CERCLA and RCRA/MTCA processes. Parties met again on 4/09/20 and are still developing a path forward. At the 4/16/20 IAMIT, the Parties agreed the small working group would be on a temporary hold while ECY took the action to examine their internal processes and will let the working group know when they are ready to continue discussions. At the 05/26/20 IAMIT, Ecology asked that the small working group continue to meet while it assesses its internal practices. Ecology also proposed the use of a facilitated “kaizen” to work through this issue, particularly as it will have ramifications on the next Waste Management Area closure process (WMA-A/AX). DOE is considering the kaizen approach. [The working group continues to meet weekly to agree to a version of](#)

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DOE/RL-2019-46, which if approved, would be added to TPA Appendix F ("Supporting Technical Plans and Procedures"). A draft IAMIT Determination (2020-007) to accompany DOE/RL-2019-46 and corresponding TPA change control form to add DOE/RL-2019-46 to Appendix F have also been drafted and are in review at the staff-level.

Closed: --

3. Changes/Updates to TPA Paragraphs 148/149

Reference: Tri-Party Agreement Legal Agreement, paragraphs 148, 149

Affected Milestone: N/A

Originated: 05/16/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to revise and update TPA paragraphs 148/149 (see also: "Status Updates, item #1 below).

Comments: IAMIT has agreed to discuss this update and potentially change the TPA Legal Agreement. The parties have been discussing potential changes for a number of years. History and background have been provided. IAMIT is being asked to meet as a "core" team to discuss changes and eventually recommend to the Executive Managers signing a TPA Change Control Form to document those changes. Meeting was held on 06/27/19, with the parties' subject matter experts and legal teams to discuss the history and rationale for proposed changes. DOE is reviewing paragraphs 148/149 to look at simplifying the proposed changes and will provide to regulators for review. At the 07/18/19 IAMIT, the parties agreed that a kick-off meeting should be scheduled to sign the AIP and start negotiations. At the 08/15/19 IAMIT meeting, MSA agreed to work with DOE to schedule a kick-off meeting. Parties have yet to agree to a date for the meeting. On 09/09/19, DOE-RL provided to Ecology via letter 19-AMRP-0074, a timeline of efforts made to update the language in 148 and 149 and offered to schedule joint meetings to accomplish this task. At the 10/17/19 IAMIT, DOE noted they would not take further action at this time without further discussion and buy in from the parties to perform a meaningful exercise to revise paragraphs 148 and 149. DOE stated they are committed to following federal law and the TPA and will continue to do so whether these paragraphs are revised or not. At the 11/21/19 IAMIT, the parties agreed an update to reflect current mechanisms of the federal budgeting process is needed and to perform this update via TPA negotiations. MSA took the action to draft an Agreement in Principle (AIP). That AIP would set a March 31, 2020 date for completing negotiations. The parties also expressed the need for their respective lawyers to be included in negotiations. At the 12/19/19 IAMIT, DOE-RL noted they were reviewing the draft AIP. The draft AIP was provided to the regulators for review with comments requested by COB 01/22/2020. EPA and Ecology comments were received on 01/23/20. DOE is currently reviewing the AIP. On 3/23/20, the Parties signed the AIP to begin negotiations, which are currently scheduled to conclude 07/31/20. On 4/07/20, Tri-Party attorneys met to discuss federal budget process and path forward to update these paragraphs. DOE provided responses to ECY/EPA attorney comments made during this meeting for their review. Action remains with ECY/EPA legal to respond back to DOE. No meetings are currently scheduled. At the 05/26/20 IAMIT, the Parties once again agreed that paragraphs 148/148 needed updating, but EPA and Ecology are still unclear of the overall desired outcome of those updates. DOE took the action to reconvene the technical staff and attorneys to continue negotiations. DOE Legal forwarded the embargoed budget guidance to the regulator attorneys and DOE is awaiting a response. The Parties are

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currently under an AIP to negotiate updates to paragraphs 148 and 149 through 7/31/20. At the 6/18/20 IAMIT, the Parties agreed that the technical staff from each agency should be included in the negotiations with the attorneys. MSA had the action to schedule meetings to continue negotiations. MSA scheduled a series of three meetings on August 5, 18, and 19.

Closed: —

4. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

Reference: ECY letter NWP-20-201 and DOE letter 20-PFD-0013

Affected Milestone: N/A

Originated: 01/23/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.

Comments: Correspondence on "Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition Projects" was added at the 1/23/20 IAMIT. DOE took the action to brief EPA and ECY at the March 2020 IAMIT (to be timed with the RASCAL Team briefing). This will address lifecycle soil usage versus D4 versus time. The IAMIT scheduled for 3/19/20 was cancelled. DOE-RL briefed the IAMIT on 4/16/20, in that briefing, DOE said the on-going Covid-19-related work posture, and pending Hanford prime contract changes may affect this issue and pledged to provide updates. [There was no change in status provided at the 06/18/20 IAMIT.](#)

Closed: —

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5. IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements

Reference: TPA Article XXXIII “Notification Requirements”

Affected Milestone: N/A

Originated: 04/20/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to sign an IAMIT Determination extension to allow for a temporary suspension of the requirement for physical signatures and hard-copy delivery of TPA-related documents, due to restrictions stemming from the Covid-19 pandemic. The current IAMIT Determination is valid through 07/31/20.

Comments: The Parties had discussed potentially making permanent changes to TPA Paragraphs 108/109 of Article XXXIII (and tying the potential changes to TPA Section 9.4 “Hard Copy Requirements/Hanford Administrative Record as a change to put before public comment), however, with the next TPA Five-Year Review approaching, it was decided to deal with the potential changes at that time. Proposing to the IAMIT to close this action as it will be a topic for the Parties to discuss during the TPA Five-Year review, which will begin next year. On 05/26/20, the Parties signed an extension to this temporary agreement, making it effective until 07/31/20 (reference IAMIT Determination 2020-005). [MSA drafting IAMIT Determination 2020-009 to extend this through 12/31/20.](#)

Closed: —

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Table II. Status Updates

1. Draft Agreement in Principle: Revising and Updating TPA Appendices H and I	
Reference:	Tri-Party Agreement Action Plan, Appendices H and I
Affected Milestone:	M-042-00 and M-045-00 series
Originated:	05/16/19
Status:	Open
Dispute Extended:	N/A
Action:	Parties are being asked to review the draft TPA Agreement in Principle for entering into formal negotiations to revise and update TPA Appendices H and I.
Comments:	The parties agree that TPA appendices H and I are outdated and in need of change. Though attempts have been made and proposals for changing have been shared by the parties, no change has occurred. In light of the current 241-C-106 Waiver Request Denial Dispute, the parties are agreeing to enter formal TPA negotiations. At the 6/20/19 IAMIT, the Parties agreed to schedule a kick-off meeting and share the draft AIP, meeting has yet to be scheduled. At the 07/18/19 IAMIT, the parties agreed that an AIP was necessary to enter into negotiations for updates to Appendices H & I in a two-phased approach, first being the easy updates and then proceed to the more challenging updates. The parties also agreed to add TPA section 11.8 (ORP Critical Path) as part of these negotiations. At the 08/15/19 IAMIT, MSA took the action to revise the draft Appendix H, I AIP to include TPA section 11.8. Ecology noted that the TPA dispute over retrieval criteria for SST 241-C-106, currently before the Washington State Pollution Control Hearings Board could delay discussions. *Note: the PCHB dispute was dismissed on 04/07/20. At the 10/17/19 IAMIT, the parties agreed revisions to Appendices H and I should be placed on hold pending the path forward determined from the Hanford tank waste mission "holistic" discussions. At the 05/26/20 IAMIT, there was no change in status. At the 6/18/20, there was no change in status.
Closed:	—
2. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget	
Reference:	N/A
Affected Milestone:	M-015-84, M-015-91B, M-015-92C, M-015-93B, , M-015-98, M-015-99, M-015-112, M-016-255, M-016-256, M-085-70 (currently in dispute at the PM level), M-085-80
Originated:	12/20/18
Status:	Open - Agreement in Principle (AIP) and corresponding Tentative Agreement (TA) has been drafted
Dispute:	N/A
Extended:	
Action:	Sign Agreement in Principle, enter into negotiations
Comments:	These negotiations are driven primarily by requirements found in HFFACO, Legal Agreement, Paragraph 148.A, which requires DOE-RL to include in its annual budget request to the DOE Office of Environmental Management (DOE-EM) estimated funding levels required to achieve full compliance with HFFACO milestones. The FFY 2018 appropriation by Congress and the FFY 2019

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President's budget request to Congress, respectively, were less than the DOE-RL estimated funding levels submitted to DOE-EM. HFFACO, Legal Agreement, Paragraph 149.G allows DOE-RL to propose changes to milestones in response to congressional budget appropriations that are less than estimated funding levels required to achieve full compliance. HFFACO, Legal Agreement, Paragraph 149.D states that DOE-RL shall assess the impacts of the President's budget on DOE-RL's ability to complete milestones on time. At the 12/20/18 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on 12/19/18, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the 01/31/19 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. At the 2/21/19 IAMIT, the Parties were asked for an update on status. There was no change in status. At the 3/21/19 IAMIT, Ecology stated that both Ecology and EPA were discussing the language in the AIP and TA and will send to DOE. Action is with Ecology and EPA to provide comments. Ecology questioned the language in the AIP/TA and sent it to EPA for their review. At the 04/24/19 IAMIT, DOE-RL took the action to schedule a teleconference between the Tri-Parties to discuss current status and path forward to negotiations. (See also item above regarding M-015-93C.) On 05/06/19, DOE received the AIP from EPA and is currently reviewing it for approval. At the 06/20/19 IAMIT, the parties discussed expectations for the AIP. Ecology stated there is a letter going to DOE regarding budget that was currently in review with Ecology legal. On 07/03/19 Ecology noted it would not sign AIP until it received a response to its letter of 07/10/19 (19-NWP-109). DOE requested an extension to 08/02/19 to respond to the letter. At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. As of 09/09/19, DOE-RL requested Ecology's reconsideration of approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 10/17/19 IAMIT Ecology stated they wanted to resolve the issues with TPA Paragraphs 148/149 before signing an AIP. DOE disagreed, saying the issues were separate. At the 11/21/19 IAMIT, the parties agreed that the "Representative Analogous Site Coordinating Agency Liaisons (RASCAL)" team conclusions might provide a resolution to this issue. The RASCAL team, comprised of all three agencies is currently evaluating a proposal, which will ensure consistent remedies for similar conceptual site model groups and associated waste sites, and could potentially reduce characterization pre-ROD and post-ROD. At the 4/16/20 IAMIT, an update on RASCAL Team progress was presented. The IAMIT granted approval to proceed with next steps, the RASCAL Team will: (1) Draft a White Paper, and (2) engage the contractor for cost estimates, to include cost avoidance and proposed milestones and report back to the IAMIT in a couple of months. At the 05/26/20 IAMIT, the RASCAL Team noted it was planning an update to the IAMIT in June, with a possible draft IAMIT Determination and White Paper ready for review as well. Ecology reiterated the RASCAL process will not solve all issues with all of the milestones, in particular milestone M-015-93C for the 200-SW-2 Operable Unit. As of 06/11/20, an IAMIT Determination had been drafted and will be shared with the IAMIT. DOE agreed to take M-015-93B and M-015-93C, out of the "budget" negotiations and add them to the M-091 milestone negotiations. [At the 6/18/20 IAMIT, the Parties agreed that a new Agreement in Principle \(AIP\) should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft "Budget AIP". MSA took the action to draft the AIP, which is in review. IAMIT determination 2020-006 "RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau" was signed on 06/23/20.](#)

Closed:

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3. Modifications to TPA Section 9.4, "Administrative Record," to Eliminate Hard Copy Requirements

Reference: TPA Section 9.4

Affected N/A

Milestone:

Originated: 11/15/18 (re-opened)

Status: Open - Change Control Form P-09-18-01 has been drafted.

Dispute N/A

Extended:

Action: Sign Change Control Form

Comments: Change Control Form in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record (AR). DOE upgraded the Administrative Record website to enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting, enable electronic document submittal, and improve system response time. At the December 20, 2018 IAMIT meeting, Ecology indicated they would be ready to sign this change control form when the AR upgrade is complete. The system upgrade was completed in June 2019. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a "validation and verification" meeting to assess the AR upgrades. On 8/28/19, a validation meeting was held. Ecology took the action to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. At the 10/17/19 IAMIT, it was noted this action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE. At the 11/21/19 IAMIT, Ecology noted the progress made on the AR upgrade, but still had concerns about documents being removed from the AR and a lack of procedure for doing so. At the 12/12/19 IAMIT, Ecology took the action to discuss what they propose at the 01/23/20 IAMIT – including draft changes to the TPA. On 01/28/20, Ecology sent the draft TPA Change Control Form to the Parties for review. At the 02/20/20 IAMIT, the Parties agreed to suspend this discussion until the M-035-09K and M-035-09L disputes are settled, though it will still be tracked at the IAMIT level.

Closed: —

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Table III. Recently Closed/Other Agreements

1. Baseline Risk Assessment for WMA-C

Reference: Phase II RCRA Facility Investigation for Waste Management Area C (RPP-RPT-58339)

Affected Milestone: M-045-61 (completed)/TPA Appendix I

Originated: 02/21/19

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to agree on the path forward/resolution for four specific areas of the Baseline Risk Assessment: Judgmental Samples; Hazards Index; Groundwater Ingestion and Food Chain Pathway

Comments: Presentations were given by Ecology and DOE at the 02/21/19 IAMIT.. There was no change in status at the 03/21/19 IAMIT. The IAMIT met on 05/08/19 to attempt resolution on 4 issues. Two of four (Judgmental Samples and Hazard Index) were resolved and IAMIT Determinations have been drafted and are with the IAMIT for review. The two remaining issues (Groundwater Ingestion and Food Chain Pathway) are being discussed internally by Ecology and await resolution. There were other broader issues discussed regarding future land use and the possible formal adoption of the Inner Areas Principles to apply to tank farm cleanup that are up for future discussion by the IAMIT. IAMIT is still tasked with resolving the remaining two issues (Groundwater Ingestion and Food Chain Pathway). The parties must also determine whether the Baseline Risk Assessment is a TPA Primary or Secondary Document. At the 07/18/19 IAMIT, the parties agreed to a "core" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway further. At the 08/15/19 IAMIT, Ecology stated that they were still reviewing the draft IAMIT Determinations for Judgmental Samples and Hazard Indices. At the 10/17/19 IAMIT, Ecology committed to reviewing the language in the Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) for the BRA WMA-C by the November 2019 IAMIT meeting. A "stand-alone" IAMIT meeting to discuss the Groundwater Ingestion and Food Chain Pathway issues was held 11/21/19 where the parties agreed to sign IAMIT Determinations on Judgmental Samples and Hazard Index (signed 11/25/19). The two remaining issues - Groundwater Ingestion and Food Chain Pathway remain open, though ORP has drafted IAMIT Determinations on these issues, which are in review by the parties. On 12/19/19, draft versions of the two IAMIT Determinations were exchanged between the parties. On 12/20/19, Ecology asked for a meeting to discuss. At the 1/23/20 IAMIT, the Parties stated they had met, have exchanged drafts and are close to agreement on remaining two IAMIT Determinations. At the 02/20/20 IAMIT meeting, Ecology indicated the Food Chain Pathway IAMIT Determination was provided to DOE, but they are still working on the GW Ingestion IAMIT Determination. Food Chain Pathway IAMIT Determination (#2019-008) was signed on 05/12/20. Ecology sent a draft of the Groundwater Ingestion IAMIT Determination to DOE on 05/26/20. [Parties have signed all four IAMIT determinations.](#)

Closed: [06/25/20](#) - Hazard Index IAMIT Determination (#2019-005) and Judgmental Samples IAMIT Determination (#2019-006) were signed 11/25/19. Food Chain Pathway IAMIT Determination (#2019-008) was signed on 05/12/20. [The final IAMIT Determination, Groundwater \(#2019-007\) was signed 06/25/20.](#)

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2. IAMIT Determination – Delete Audio Files of Meetings Upon Approved Meeting Minutes

Reference: Draft IAMIT Determination #2020-001

Affected Milestone: N/A

Originated: 02/20/20 IAMIT

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to sign an IAMIT Determination allowing for audio files of TPA meetings to be destroyed (deleted) upon signed, approved meeting minutes.

Comments: MSA uses audio recordings of certain TPA meetings as an aid in producing meeting minutes. In accordance with DOE Records Administrative Schedule 21.22, Records Exclusively for Transcription, the instruction reads as follows: "Recordings of meetings made exclusively for note taking or transcription, EXCLUDING recordings of proceedings of Presidential commissions and other executive commissions. Destroy immediately after use." Therefore, the audio files will be deleted after obtaining approval of the TPA meeting minutes. However, any audio files subject to a "Legal Hold" will be retained until the Legal Hold Notice has been terminated. At the 4/16/20 IAMIT meeting, DOE-RL (Hamel) has requested a meeting with Ecology (Price) to discuss further. At the 5/26/20 IAMIT, DOE indicated a revised draft IAMIT Determination was initially agreed to with Ecology. MSA took the action to send out the latest draft IAMIT Determination 2020-001 for the Parties to review and then route for approval. On 6/01/20, the Parties approved this IAMIT Determination, therefore closing the action. [At the 06/18/20 IAMIT, the Parties agreed to close this action.](#)

Closed: [06/18/20](#)

3. Update of TPA Appendix B: Listing of Treatment, Storage, and Disposal Groups/Units

Reference: TPA Appendix B - Listing of Treatment, Storage, and Disposal Groups/Units

Affected Milestone: N/A

Originated: Required annually

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to update TPA Appendix B.

Comments: At the 02/20/20 IAMIT meeting, ECY took action to inquire with their permitting team to find out how new TSD numbers are assigned. In parallel, MSA has drafted the latest proposed update to Appendix B, which is currently with ECY and EPA for review. [At the 05/26/20 IAMIT, Ecology indicated they would like to discuss their comments with DOE, but asked if DOE, timing and priority wise, would like to take a month or two to address in order to provide ample time for review. DOE took the action to discuss its available resources for working on the Appendix B update, and if this effort would be considered a priority and report back to the IAMIT. At the 06/18/20 IAMIT, the Parties agreed to address an update to TPA Appendix B in the upcoming TPA Five-Year Review and considered this action closed at the IAMIT level.](#)

Closed: [06/18/20](#)